

Fletcher, Rachel

From: Reaves, Elissa
Sent: Monday, May 24, 2021 5:37 PM
To: Britton, Cathryn
Cc: Kiely, Timothy; Biscoe, Melanie; Fletcher, Rachel
Subject: RE: petitions to cancel

Let me discuss with Marietta and Tim and I can bring up at our general with Ed and Mike as well.

Elissa Reaves, Ph.D.
Director, Pesticide Re-evaluation Division
Office of Pesticide Programs
703-305-0312

From: Britton, Cathryn <Britton.Cathryn@epa.gov>
Sent: Monday, May 24, 2021 2:04 PM
To: Reaves, Elissa <Reaves.Elissa@epa.gov>
Cc: Kiely, Timothy <Kiely.Timothy@epa.gov>; Biscoe, Melanie <Biscoe.Melanie@epa.gov>; Fletcher, Rachel <fletcher.rachel@epa.gov>
Subject: FW: petitions to cancel

Hi Elissa,

Attached is a letter to acknowledge EPA's receipt of the petition from CBD, sent 4/8/21, requesting EPA cancel the registrations for Seresto.

The purpose of this letter is to let the petitioners know we received their request only.

We wanted to ask who should sign this. According to OGC and the folks in RSD, it can be signed at the DD level, or above. Since this is pretty high-profile, we're not sure if you and Marietta would want to sign this, or perhaps this should come from Ed or Michal?

I know we had separately discussed putting the petition out for public comment. The neonic petition was posted for a 60-day public comment period and we can do the same. Rachel F. has agreed to help coordinate this effort. Let us know if you like us to start drafting the FRN to announce this.

Thanks,
Cathryn

From: Stoner, Nora <Stoner.Nora@epa.gov>
Sent: Friday, May 21, 2021 11:49 AM
To: Britton, Cathryn <Britton.Cathryn@epa.gov>; Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>; Smoot, Cameo <Smoot.Cameo@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Fletcher, Rachel <fletcher.rachel@epa.gov>
Cc: Wakefield, Benjamin J. <wakefield.benjamin@epa.gov>; Pittman, Forrest <Pittman.Forrest@epa.gov>
Subject: RE: petitions to cancel

Here is an updated letter with edits from the comments in this email chain.
Thank you all.

Nora Stoner

Regulatory Services Branch (RSB)
Mission Support Division (MSD)
Office of Program Support (OPS)
Office of Chemical Safety and Pollution Prevention (OCSPP)
U.S. Environmental Protection Agency (EPA)
W: (202) 564-0355

From: Britton, Cathryn <Britton.Cathryn@epa.gov>
Sent: Thursday, May 20, 2021 4:10 PM
To: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>; Smoot, Cameo <Smoot.Cameo@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Stoner, Nora <Stoner.Nora@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Fletcher, Rachel <fletcher.rachel@epa.gov>
Cc: Wakefield, Benjamin J. <wakefield.benjamin@epa.gov>; Pittman, Forrest <Pittman.Forrest@epa.gov>
Subject: RE: petitions to cancel

Just to follow-up on this, will an updated letter be shared?

Thanks,
Cathryn

From: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>
Sent: Wednesday, May 19, 2021 9:35 AM
To: Smoot, Cameo <Smoot.Cameo@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Stoner, Nora <Stoner.Nora@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>; Fletcher, Rachel <fletcher.rachel@epa.gov>
Cc: Wakefield, Benjamin J. <wakefield.benjamin@epa.gov>; Pittman, Forrest <Pittman.Forrest@epa.gov>
Subject: RE: petitions to cancel

Works for me!

Thanks,
Jackie

Jacquelyn Herrick, PM 3
Invertebrate-Vertebrate Branch 1
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0559
herrick.jacquelyn@epa.gov

From: Smoot, Cameo <Smoot.Cameo@epa.gov>
Sent: Wednesday, May 19, 2021 9:27 AM
To: Koch, Erin <Koch.Erin@epa.gov>; Stoner, Nora <Stoner.Nora@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>; Fletcher, Rachel <fletcher.rachel@epa.gov>
Cc: Wakefield, Benjamin J. <wakefield.benjamin@epa.gov>; Pittman, Forrest <Pittman.Forrest@epa.gov>
Subject: Re: petitions to cancel

Regarding the bcc. My thoughts. I think we can eliminate the bcc list in the letter and include one contact from OGC, RD and PRD in the cc list. When we send the letter electronically, we could bcc the remaining staff in only the email?

Cameo G. Smoot

Regulatory Support Branch
Mission Support Division
Office of Program Support, Office of Chemical Safety and Pollution Prevention
Environmental Protection Agency
smoot.cameo@epa.gov
(Cell) 301 335-2911



From: Koch, Erin <Koch.Erin@epa.gov>
Sent: Wednesday, May 19, 2021 7:48 AM
To: Stoner, Nora <Stoner.Nora@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>; Fletcher, Rachel <fletcher.rachel@epa.gov>
Cc: Smoot, Cameo <Smoot.Cameo@epa.gov>; Wakefield, Benjamin J. <wakefield.benjamin@epa.gov>; Pittman, Forrest <Pittman.Forrest@epa.gov>
Subject: RE: petitions to cancel

I admit, I had taken it to mean the bccs wouldn't be included when the letter was actually sent. It's up to OPP, but consider whether you want to include a long list of names or just key contact people for each division/office.

From: Stoner, Nora <Stoner.Nora@epa.gov>
Sent: Wednesday, May 19, 2021 7:07 AM
To: Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>; Fletcher, Rachel <fletcher.rachel@epa.gov>
Cc: Smoot, Cameo <Smoot.Cameo@epa.gov>; Wakefield, Benjamin J. <wakefield.benjamin@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Pittman, Forrest <Pittman.Forrest@epa.gov>
Subject: RE: petitions to cancel

I see – we can add them to the cc list then.

Nora Stoner

Regulatory Services Branch (RSB)
Mission Support Division (MSD)
Office of Program Support (OPS)
Office of Chemical Safety and Pollution Prevention (OCSPP)
U.S. Environmental Protection Agency (EPA)
W: (202) 564-0355

From: Saunders, Jennifer <Saunders.Jennifer@epa.gov>
Sent: Wednesday, May 19, 2021 6:53 AM
To: Stoner, Nora <Stoner.Nora@epa.gov>; Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>; Fletcher, Rachel <fletcher.rachel@epa.gov>
Cc: Smoot, Cameo <Smoot.Cameo@epa.gov>; Wakefield, Benjamin J. <wakefield.benjamin@epa.gov>; Koch, Erin

<Koch.Erin@epa.gov>; Pittman, Forrest <Pittman.Forrest@epa.gov>

Subject: RE: petitions to cancel

Hey Nora, I think Jackie means, if the names are actually being listed in the letter, shouldn't it be "cc" and not "bcc" since it's obviously not "blind" as the recipient will see the names? Just a technical comment.

From: Stoner, Nora <Stoner.Nora@epa.gov>

Sent: Wednesday, May 19, 2021 6:45 AM

To: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>; Fletcher, Rachel <fletcher.rachel@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>

Cc: Smoot, Cameo <Smoot.Cameo@epa.gov>; Wakefield, Benjamin J. <wakefield.benjamin@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Pittman, Forrest <Pittman.Forrest@epa.gov>

Subject: RE: petitions to cancel

I'm viewing the bcc as a courtesy to the entire work group and also letting the parties know who is working on the petition. If we get more into the weeds on this, we can remove some of the bccs, or all of them and keep them in internal correspondence only, or just cc them if they'd like to still be included in the innerworkings.

Since we are not asking for a response or anything from this company, we are only letting them know EPA has their petition in their records and is aware of this, there is not a huge risk in listing too many people since they are not prompted to respond. We can discuss removing the bcc at the next meeting if we ask for more information/documentation at any point.

Thanks for asking, Jackie!

Nora Stoner

Regulatory Services Branch (RSB)
Mission Support Division (MSD)
Office of Program Support (OPS)
Office of Chemical Safety and Pollution Prevention (OCSPP)
U.S. Environmental Protection Agency (EPA)
W: (202) 564-0355

From: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>

Sent: Wednesday, May 19, 2021 6:29 AM

To: Stoner, Nora <Stoner.Nora@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>; Fletcher, Rachel <fletcher.rachel@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>

Cc: Smoot, Cameo <Smoot.Cameo@epa.gov>; Wakefield, Benjamin J. <wakefield.benjamin@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Pittman, Forrest <Pittman.Forrest@epa.gov>

Subject: RE: petitions to cancel

Hi all,

What is the point of the following portion of the letter?

bcc. Forrest Pittman (OGC / PTSLO) (pittman.forrest@epa.gov)
 Erin Koch (OGC / PTSLO) (Koch.erin@epa.gov)
 Cameo Smoot (OCSPP / RSB) (smoot.cameo@epa.gov)

If we are "bcc-ing" certain individuals do they really want their name and contact info on the letter?

Jackie

Jacquelyn Herrick, PM 3
Invertebrate-Vertebrate Branch 1
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0559
herrick.jacquelyn@epa.gov

From: Stoner, Nora <Stoner.Nora@epa.gov>
Sent: Wednesday, May 19, 2021 6:14 AM
To: Britton, Cathryn <Britton.Cathryn@epa.gov>; Fletcher, Rachel <fletcher.rachel@epa.gov>; Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>
Cc: Smoot, Cameo <Smoot.Cameo@epa.gov>; Wakefield, Benjamin J. <wakefield.benjamin@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Pittman, Forrest <Pittman.Forrest@epa.gov>
Subject: RE: petitions to cancel

Great! Thank you, Ben!

Now it's on to you all at RD and PRD to get this signed and either sent back to me or sent out from your offices. Again, all the information for who is being contacted and who needs to be cced is in the doc.

Thank you all!

Nora Stoner

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Mission Support Division (MSD)
Office of Program Support (OPS)
Office of Chemical Safety and Pollution Prevention (OCSPP)
U.S. Environmental Protection Agency (EPA)
W: (202) 564-0355

From: Wakefield, Benjamin J. <wakefield.benjamin@epa.gov>
Sent: Tuesday, May 18, 2021 3:03 PM
To: Stoner, Nora <Stoner.Nora@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Pittman, Forrest <Pittman.Forrest@epa.gov>
Cc: Smoot, Cameo <Smoot.Cameo@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>; Fletcher, Rachel <fletcher.rachel@epa.gov>; Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>
Subject: RE: petitions to cancel

Hi Nora.

My edits are attached. Erin has no further comments. I don't know if Forrest will be reviewing or has further edits/comments.

Thanks!

- Ben

From: Stoner, Nora <Stoner.Nora@epa.gov>
Sent: Tuesday, May 18, 2021 12:15 PM
To: Wakefield, Benjamin J. <wakefield.benjamin@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Pittman, Forrest <Pittman.Forrest@epa.gov>
Cc: Smoot, Cameo <Smoot.Cameo@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Pittman, Forrest

<Pittman.Forrest@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>; Fletcher, Rachel <fletcher.rachel@epa.gov>; Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>

Subject: RE: petitions to cancel

Here is the acknowledgement letter RSB Has drafted for this workgroup to send.

OGC/PTSLO reps please give any feedback, this letter should be basic enough that we can pass it along quickly. A reminder that OPP RD and PRD you all will be receiving an edited version that will need to be signed and then either sent back to me to send out or sent out to the parties listed in the letter.

Thank you all.

Nora Stoner

Regulatory Services Branch (RSB)
Mission Support Division (MSD)
Office of Program Support (OPS)
Office of Chemical Safety and Pollution Prevention (OCSPP)
U.S. Environmental Protection Agency (EPA)
W: (202) 564-0355

From: Stoner, Nora

Sent: Thursday, May 6, 2021 7:45 AM

To: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Wakefield, Benjamin J. <wakefield.benjamin@epa.gov>

Cc: Smoot, Cameo <Smoot.Cameo@epa.gov>

Subject: RE: petitions to cancel

Hi all –

First things first, Benjamin Wakefield, you will need to verify that this is a petition and then begin to draft a receipt letter (typically sent about 10 days or less within receipt of the petition). We will need to determine who will sign the receipt letter. I can ask a couple questions of my Branch Chief to see if she knows anything about this.

From there, the process is a bit in flux, there isn't a clear cut way of handling any of these petitions.

I have attached an old SOP that my colleague sent me (also cced on this email) to give a broad overview of the process you all will be taking part in if this is determined to be a petition.

Benjamin Wakefield, if you could respond with an answer, I have also attached an acknowledgement/receipt letter template to the petitioners. But this is a process that if I were to take place in, I would only help guide, coordinate, and fill in some holes here and there.

The final calls are up to OPP, OGC and RSB are here to help make sure those decisions are in line with appropriate timelines and regs.

Thank you.

Nora Stoner

Regulatory Services Branch (RSB)
Mission Support Division (MSD)
Office of Program Support (OPS)
Office of Chemical Safety and Pollution Prevention (OCSPP)
U.S. Environmental Protection Agency (EPA)
W: (202) 564-0355

From: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>
Sent: Wednesday, May 5, 2021 1:47 PM
To: Stoner, Nora <Stoner.Nora@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>
Cc: Wakefield, Benjamin J. <wakefield.benjamin@epa.gov>
Subject: RE: petitions to cancel

Hi Nora,

Attached is the Seresto petition from CBD. Also Ccing Ben Wakefield ot PTSLO as he has been assigned to help out from the legal side of things.

Let me know if you need anything else.

Thanks,
Jackie

Jacquelyn Herrick, PM 3
Invertebrate-Vertebrate Branch 1
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0559
herrick.jacquelyn@epa.gov

From: Stoner, Nora <Stoner.Nora@epa.gov>
Sent: Tuesday, May 04, 2021 11:32 AM
To: Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>
Subject: RE: petitions to cancel

Sure thing!

Feel free to send me any letters and accompanying documents you currently have concerning this petition and I can either facilitate or help guide the team with writing responses. I have a number of template letters I can share with anyone who needs them.

Nora Stoner

Regulatory Services Branch (RSB)
Mission Support Division (MSD)
Office of Program Support (OPS)
Office of Chemical Safety and Pollution Prevention (OCSPP)
U.S. Environmental Protection Agency (EPA)
W: (202) 564-0355

From: Saunders, Jennifer <Saunders.Jennifer@epa.gov>
Sent: Tuesday, May 4, 2021 10:26 AM
To: Stoner, Nora <Stoner.Nora@epa.gov>
Cc: Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>
Subject: RE: petitions to cancel

Hey Nora, copying Jackie Herrick, she can send you the petition we're talking about. There is a contact from OGC on it, but my DD thought that someone in RSB would help with the general response and process. Thanks!

From: Stoner, Nora <Stoner.Nora@epa.gov>
Sent: Tuesday, May 4, 2021 10:18 AM

To: Saunders, Jennifer <Saunders.Jennifer@epa.gov>

Subject: RE: petitions to cancel

Hi Jennifer,

I am the RSB contact for Data Compensation petitions, but I can take a look at any petition if there is any question as to what it is specifically regarding.

Petitions that are not data comp can typically be resolved by contacting OGC with any materials and working with them directly. I have also previously, and am currently, facilitating some other petitions that are not data comp to help guide the petitions process if there are any questions, so I can be available here and there for that purpose.

Thank you! I can still take a look at anything and help out to the best I can!

Nora Stoner

Regulatory Services Branch (RSB)

Mission Support Division (MSD)

Office of Program Support (OPS)

Office of Chemical Safety and Pollution Prevention (OCSPP)

U.S. Environmental Protection Agency (EPA)

W: (202) 564-0355

From: Saunders, Jennifer <Saunders.Jennifer@epa.gov>

Sent: Tuesday, May 4, 2021 9:59 AM

To: Stoner, Nora <Stoner.Nora@epa.gov>

Subject: petitions to cancel

Hi Nora, my division director mentioned that you might be the contact for the Registration Division in OPP for petitions to cancel—is this the case? Thanks!

Jennifer Urbanski Saunders, Ph.D., Chief

Invertebrate & Vertebrate Branch 1

Registration Division (7505P)

Office of Pesticide Programs

U.S. Environmental Protection Agency

(703) 347-0156